

REDACTED - FOR PUBLIC INSPECTION



March 20, 2015

**FILED VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-B204  
Washington, D.C. 20554

**Re: Rural Call Completion Reporting  
WC Docket No. 13 - 39**

Dear Ms. Dortch:

East Kentucky Network, LLC d/b/a Appalachian Wireless (EKN) and its Affiliates<sup>1</sup> hereby report to the Commission as follows:

- EKN and its Affiliates serve more than 100,000 domestic retail long-distance subscriber lines<sup>2</sup>.
- EKN and its Affiliates are not “covered providers” because none of them makes the initial long-distance call path choice for any of these lines.
- EKN and its Affiliates hand off their long-distance calls to [REDACTED] as their primary underlying carrier, which has been copied on this letter.
- EKN hands off overflow traffic to [REDACTED] which has also been copied on this letter.
- The Affiliates, except for Thacker-Grigsby Telephone and TVS Cable, Inc., hand off overflow traffic to [REDACTED], which has also been copied on this letter.

Please do not hesitate to contact me if you have any questions.

Sincerely,

Michael Huffman, CPA  
Financial Operations Director

Cc: [REDACTED]

<sup>1</sup> Gearheart Communications d/b/a Coalfields Telephone Company, Inter-Mountain Cable, Inc., Mikrotec of Virginia, Thacker-Grigsby Telephone Company, TVS Cable, Inc., Mountain Rural Telephone Company, Peoples Rural Telephone Cooperative, Foothills Telephone Cooperative, Corp.

<sup>2</sup> Each of the Affiliates serves fewer than 12,000 long distance subscribers and would not file this letter absent their affiliation with EKN.

March 25, 2015

**VIA HAND DELIVERY**

Marlene H. Dortch  
Secretary  
Federal Communications Commission  
445 12th Street, S.W., Room TW-A306  
Washington, D.C. 20554

**Re: Rural Call Completion Reporting  
WC Docket No. 13 - 39**

Dear Secretary Dortch:

On behalf of East Kentucky Network, LLC d/b/a Appalachian Wireless (EKN) and its affiliates, enclosed is a confidential version of EKN's letter filed pursuant to requirements in the above-referenced docket. The enclosed confidential version of the letter has been marked **"CONFIDENTIAL – NOT FOR PUBLIC INSPECTION."**

An additional copy of this filing has been provided, which you are requested to date-stamp and return.

EKN is also submitting, via ECFS, a redacted public copy of the letter. The redacted public copy has been marked **"REDACTED – FOR PUBLIC INSPECTION."**

EKN respectfully requests confidential treatment of the names of the carriers to which it and its affiliates hand off their long-distance calls, because this information is competitively sensitive and its disclosure would have a negative competitive impact on EKN were it made publicly available. Such information would not ordinarily be made available to the public, and should be afforded confidential treatment under 47 C.F.R. §§ 0.457 and 0.459.

**47.C.F.R. § 0.457**

Specific information in the letter is confidential and proprietary to EKN as "trade secrets and commercial or financial information" under 47 C.F.R. § 0.457(d). Disclosure of such information to the public would risk revealing company-sensitive proprietary information in connection with EKN's ongoing business and operations.

**47 C.F.R. § 0.459**

Specific information in the letter is also subject to protection under 47 C.F.R. § 0.459, as demonstrated below.

**Information for which confidential treatment is sought**

EKN requests that the names of the carriers to which it and its affiliates hand off their long-distance calls be treated on a confidential basis under Exemption 4 of the Freedom of Information Act. This information is competitively sensitive, and EKN's contracts require that this information not be publicly disclosed. This information is not normally made available to the public. Release of the information would have a substantial negative impact on EKN since it would provide competitors with commercially sensitive information. Further, public disclosure of this information is entirely unnecessary for the Commission to achieve its underlying goals in the Rural Call Completion proceeding.

**Commission proceedings in which the information was submitted**

The information is being submitted in WC Docket No. 13 - 39.

**Degree to which the information in question is commercial or financial, or contains a trade secret or is privileged**

The information in question is competitively sensitive information which is not normally released to the public as such release would have a substantial negative competitive impact on EKN.

**Degree to which the information concerns a service that is subject to competition and manner in which disclosure of the information could result in substantial harm**

The release of this confidential and proprietary information would cause EKN competitive harm by allowing its competitors to become aware of sensitive proprietary information regarding the operation of EKN's business at a level of detail not currently available to the public.

**Measures taken by EKN to prevent unauthorized disclosure and availability of the information to the public and extent of any previous disclosures of the information to third parties**

EKN has treated and continues to treat the non-public information disclosed in the letter as confidential and has protected it from public disclosure to parties outside of the company.

Marlene H. Dortch, Secretary  
Federal Communications Commission  
March 25, 2015  
Page 3

**Justification of the period during which EKN asserts that the material should not be available for public disclosure**

EKN cannot determine at this time any date on which this information should not be considered confidential.

**Other information EKN believes may be useful in assessing whether its request for confidentiality should be granted**

Under applicable Commission decisions, the information in question should be withheld from public disclosure.

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Please contact the undersigned if any questions arise concerning the above-referenced enclosures or if you require any additional information.

Sincerely,

Robert S. Koppel

Counsel to East Kentucky Network

Enclosures